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14
15 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

16 CHARLOTTE BOWNES; JOSEPH
17 LAGRECA; JESSICA NAUMANN; and
CHRISTOPHER GOODIN, individually and
on behalf of all others similar situated,

18 Plaintiffs,

19
20 v.

21 INTERNATIONAL GAME TECHNOLOGY
22 PLC; MGM RESORTS INTERNATIONAL;
23 BALLY'S CORPORATION; PENN
ENTERTAINMENT, INC.; STATION
CASINOS, LLC,

24 Defendants.

Case No.: 3:24-cv-00528-ART-CSD

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANTS TO RESPOND TO
COMPLAINT [ECF NO. 1]**

(SECOND REQUEST)

Pursuant to LR IA 6-1, Plaintiffs Charlotte Bownes, Joseph Lagreca, Jessica Naumann, and Christopher Goodin, on one hand, and Defendant International Game Technology, PLC¹, on the other hand, by and through their respective undersigned attorneys of record (collectively, the “Parties”), hereby stipulate and agree subject to the Court’s approval to extend time for defendants to respond to the Complaint (ECF No. 1). The current deadline for Defendant International Game Technology, PLC is January 30, 2025. This is the second request for extension concerning this deadline.

1. On November 21, 2024, Plaintiffs filed their Complaint (ECF No. 1) against defendants, including Defendant International Game Technology, PLC (Defendant).
2. On November 25, 2024, Plaintiffs mailed a copy of the Complaint and Summons to a registered agent associated with Defendant (ECF No. 11).
3. On December 16, 2024, the Court approved an extension of time (ECF No. 19). The current deadline for Defendant to respond to the Complaint (ECF No. 1) is January 30, 2025 (ECF No. 19).
4. Defendant contacted Plaintiffs to discuss its position that International Game Technology, PLC is an improperly named party. The discussions are ongoing.
5. Other named defendants believe they are improperly named and counsel for proposed substitute defendants has contacted Plaintiffs. These discussions are also ongoing.
6. Plaintiffs have stated that they intend to amend the complaint to add additional parties and defendants.
7. Subject to the Court’s approval, the Parties have agreed that all defendants shall have an additional thirty days, up to and including March 3, 2025, to respond to the Complaint (ECF No. 1).
8. During the requested extension, the parties intend to confer regarding the named defendants and anticipate the filing of an amended complaint. The Parties will confer regarding the filing of any amended complaint and a proposed briefing schedule. The

¹By entering into this stipulation, Defendant International Game Technology PLC does not waive any arguments related to service of process, jurisdiction or any initial motion defenses.

requested extended is in the interest of judicial economy as continued conferral between the parties may eliminate or limit the need for certain motion practice.

9. Good cause exists to grant this stipulation and it is submitted in good faith, is not interposed for delay, and is not filed for an improper purpose.

DATED: January 21, 2025

/s/ Tyler K. Somes (with permission)

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DATED: January 21, 2025

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Attorneys for Defendant International Game Technology PLC

IT IS SO ORDERED.

**UNITED STATES DISTRICT JUDGE /
UNITED STATES MAGISTRATE JUDGE
Dated:**